

**IN RE:**

**CHAPTER 7**  
**CASE #14-30096-HJB**

NOW comes Jack E. Houghton, Jr, Chapter 7 Trustee in the above mentioned proceeding (hereinafter referred to as the "Trustee"), and moves that this Court enter an Order authorizing him, through counsel, to conduct examination and request the production of documents of Nannette Lewis (hereinafter referred to as the "Deponent") of 45 Laurel Road, Chestnut Hill, Massachusetts 02467-2202.

For reasons, the Trustee says that he is in need of various documents involving the financial affairs and dealings between the Debtor and the Deponent, as well as third parties.

The Trustee wishes to conduct examination and to compel the production of documents of the Deponent for any and all matters involving the Debtor including, but not limited to, Probate Court Financial Statements, bank account statements, loan applications, cancelled checks, agreements, letters, emails, documents evidencing real and personal property transfers, trusts, etc.

Pursuant to Bankruptcy Rule 2004(a) and (b), any party in interest may request the examination of any entity regarding the "acts, conduct or property ... of the Debtor".

The Trustee seeks to examine the Deponent under oath and to transcribe her testimony by means of stenographic record, as well as compelling the production of various documents in the possession or control of the Deponent, or her agents and others, concerning information related to the subject matter above.

WHEREFORE, the Trustee respectfully requests this Honorable Court to allow him to conduct examination under oath of Nannette Lewis and to compel her to produce records and other documents concerning the financial affairs of the Debtor, within one hundred twenty (120) days of the date of the Court Order. Additionally, to direct the Clerk of this Court to issue any subpoenas necessary to insure the attendance of the Deponent and other witnesses and for the production of documents.